HOUSBE, L.L.C. — Privacy Policy

Version 1.0

Effective Date: November 2025

1. Scope & Overview

This Privacy Policy explains how HOUSBE, L.L.C. ("HOUSBE," "we," "us," or "our") collects, uses, discloses, and safeguards personal information in connection with the HOUSBE platform and related services. This Policy applies to all users of the Platform, including Licensed Agents, HIAA Members, Buyers, Renters, FSBO Sellers, and Lenders. If you use the Platform on behalf of a legal entity, you represent that you are authorized to bind that entity to this Privacy Policy.

2. Key Points

We do not sell personal information and we do not share personal information for cross-context behavioral advertising, as those terms are defined by the California Consumer Privacy Act (CCPA/CPRA).

We honor Global Privacy Control (GPC) signals where applicable.

We process certain data as a "Service Provider/Contractor" under CCPA/CPRA and as a "Processor" under GDPR/UK GDPR when acting on behalf of business customers. We may act as an independent Controller for our own operational data (e.g., security, billing, service improvement).

3. Notice at Collection (CPRA/CCPA)

Below is our notice at collection. We provide retention periods (or criteria), purposes, and whether we sell/share (we do not).

Category	Examples	Purposes of Use	Retention (or	Sold/Shared
			criteria)	
Identifiers	Name, email,	Account setup;	For as long as	No
	phone,	lead routing;	necessary to	
	account IDs	customer	provide the	
		support; security	services and	
		and fraud	meet legal	
		prevention	obligations	

Commercial Information Internet/Network Activity	Lead selections, subscription tier, transaction metadata Device data, IP, logs, interaction events	Billing and administration; service delivery; fraud prevention; analytics Security; debugging; service reliability; analytics	Service life + legal retention requirements Service life + security logs retention policy	No No
Geolocation Data	Approximate location based on IP or user- provided ZIP	Localizing lead opportunities; security and abuse prevention	Service life; shorter for transient logs	No
Financial Data	Payment tokens (via PCI-compliant processor), last4, billing ZIP	Process payments, prevent fraud	Processor- defined + tax/financial retention	No
Sensitive Personal Information	Account logins, precise geolocation (not collected by default), government IDs (only if legally required)	Identity verification (where required), security	Only as required; limited access and retention	No
Professional/Licen sing	Real estate license number, brokerage affiliation (agents/lender s)	Eligibility verification; compliance	Active account + regulatory retention	No
Inferences	Service- related preferences (non-profiling)	Improve UX; personalize settings	Service life; opt-out available	No

4. Sources of Personal Information

You (directly) — account registration, profile, form submissions, lead selections.

Automatically — cookies/SDKs, server logs, security tools.

Third parties — payment processors, analytics/communications providers, verification services, and (where permitted) public records.

5. Use of Personal Information

Provide and operate the Platform, including lead management and communication tools.

Maintain safety, security, fraud and abuse prevention, and service integrity.

Billing and account administration; customer support.

Research and development to improve the Platform (non-sensitive, aggregated or de-identified where possible).

Compliance with law, legal process, and enforcement of our agreements and policies.

6. Cookies, Analytics & Advertising; GPC and DNT

For detailed information on how we use cookies and similar technologies, please see our Cookie Policy (available at https://housbe.com/legal/cookies). This document explains the types of cookies used on the Platform, their purposes, and how Users can manage their cookie preferences.

We use cookies and SDKs that are strictly necessary for core functionality, as well as optional cookies for analytics and performance improvements. HOUSBE does not sell or share personal information for cross-context behavioral advertising. We honor Global Privacy Control (GPC) signals where applicable. Most browsers also offer Do Not Track (DNT) signals; there is no consensus on handling DNT and we do not respond to DNT at this time.

You can manage preferences through our cookie banner and settings (link placeholder: [Manage Cookie Preferences]). Opt-out links: [Do Not Sell or Share My Personal Information] and [Limit the Use of My Sensitive Personal Information].

7. Disclosure of Personal Information

Service providers/contractors (hosting, communications, analytics, payment processing, security).

Sub-processors engaged under the DPA when we process on behalf of business customers.

Legal and compliance (to comply with law, enforce our terms, or protect rights, safety, and property).

Corporate events (mergers, acquisitions, financing). We will notify you where required by law.

8. Your Privacy Rights (U.S. State Laws)

Depending on your state, you may have the right to know/access, correct, delete, opt-out of certain processing, obtain portability, and appeal denials. We will verify your identity and respond within 45 days (with one 45-day extension where reasonably necessary). No discrimination for exercising rights.

Submit requests: [Privacy Request Form] or email privacy@housbe.info.

Authorized agents: we will require proof of authorization and identity verification.

Appeals (where required, e.g., VA/CO/CT/OR/TX): instructions will be provided in our response; unresolved appeals may be raised with your state AG.

9. Children's Privacy

The Platform is not directed to children under 13 and we do not knowingly collect personal information from children under 13. We do not sell or share personal information of consumers we know are under 16. If you believe a child provided personal information, contact us to request deletion.

10. Financial Data; GLBA/FCRA

Certain financial data processed for Lenders may be subject to the Gramm-Leach-Bliley Act (GLBA) and is therefore exempt from some state privacy rights. HOUSBE is not a consumer reporting agency (CRA) under the Fair Credit Reporting Act (FCRA) and our services are not intended to furnish consumer reports. Uploading or using consumer report data without appropriate legal basis is prohibited.

11. International Users

The Platform is primarily intended for users in the United States. If you are located in the EEA/UK/Switzerland, we will process personal data in accordance with applicable law. For cross-border transfers, we rely on appropriate safeguards (e.g., Standard Contractual Clauses and the UK Addendum). You may contact privacy@housbe.com to exercise GDPR/UK GDPR rights.

12. Security

We implement technical and organizational measures designed to protect personal information, including encryption in transit, access controls, logging and monitoring, vulnerability management, and personnel confidentiality. No method of transmission or storage is 100% secure; risks remain.

13. Retention

We retain personal information for as long as necessary to provide the services, comply with our legal obligations, resolve disputes, and enforce agreements. We apply specific retention schedules for certain records (e.g., billing/tax, security logs) and delete or de-identify data when no longer needed.

14. Disclaimers

The Platform and all content are provided "as is," without warranties of any kind, express or implied, including implied warranties of merchantability, fitness for a particular purpose, title, and non-infringement. Your use of the Platform is at your sole risk.

<u>Tokenized or Fractional Listings</u>

Some listings may reference blockchain-tokenized or fractional ownership models. These categories are descriptive only. HOUSBE does not issue, sell, or broker any tokenized or fractional ownership interests. All listings are user-provided and intended for informational purposes only.

15. Changes to this Policy

We may update this Policy from time-to-time; including any applicable Addenda published by HOUSBE, L.L.C. We will post the updated version with a new effective date and, where required, notify you. Continued use after the effective date constitutes acceptance.

16. Contact Us; Accessibility

Email: privacy@housbe.com

Address: HOUSBE, L.L.C., 900 N Federal Hwy, Ste 306, Hallandale Beach, FL 33009.

If you need this Policy in an alternative format due to a disability, contact us and we will provide reasonable accommodations.